

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SIMPSON VENTURES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:07-CV-48-WHA
)	
MIDWEST METAL PRODUCTS COMPANY, INC.,)	
)	
Defendant.)	

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Comes now the Defendant, Midwest Metal Products Company, Inc., by and through its undersigned counsel, who is a member in good standing of this Court, and moves the Court to allow James Hinshaw of the law firm of Bingham • McHale, LLP, 2700 Market Tower, 10 West Market Street, Indianapolis, IN 46204-4900 to appear of record in the above-entitled cause and participate *pro hac vice* in this civil action pursuant to Local Rule 83.1(b). As grounds for this motion, Midwest Metal Products Company shows the Court as follows:

1. James Hinshaw is an attorney licensed to practice law in the State of Indiana, having been admitted in 1992. He is a member in good standing of the bar of Indiana. In addition, he has been admitted to practice before the United States Court of Appeals for the Seventh, Ninth, and Eleventh Circuits. He is also admitted to practice in the United States District Court for the Southern District of Indiana as evidenced by the Certificate of Good Standing which is attached hereto and made a part hereof as "Exhibit A." Concurrent with the filing of this motion, Mr. Hinshaw has paid the \$20.00 fee for his admission *pro hac vice*.
2. Mr. Hinshaw is familiar with the law, facts and procedures related to the subject matter of this litigation and his law firm has represented Midwest Metal Products Company

previously, including the case of Simpson Ventures v. Midwest Metal Products, 06-CV-901-WKW, currently pending in this Court.

WHEREFORE, THE PREMISES CONSIDERED, Midwest Metal Products Company moves this Court to enter an order permitting James Hinshaw of the law firm of Bingham • McHale, LLP, 2700 Market Tower, 10 West Market Street, Indianapolis, IN 46204-4900 to appear of record and participate *pro hac vice* before the United States District Court for the Middle District of Alabama for the purpose of representing Midwest Metal Products Company.

Respectfully submitted,

s/Gregory A. Brockwell

BRETT A. ROSS (ASB-6771-O76B)

GREGORY A. BROCKWELL (ASB-9949-R49B)

Attorneys for Defendant Midwest Metal
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing pleading upon all counsel of record in this cause by electronically filing the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following on this the 15th day of April, 2007:

Robert T. Meadows, III
Capell & Howard, P.C.
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Opelika, Alabama 36803

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s/Gregory A. Brockwell
Of Counsel

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SIMPSON VENTURES, INC.,

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**MIDWEST METAL PRODUCTS
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))))))))))

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EXHIBIT A**

United States District Court
For the Southern District of Indiana



CERTIFICATE OF
GOOD STANDING

*I, Laura A. Briggs, Clerk of the United States District Court
for the Southern District of Indiana, do hereby certify that*

JAMES M. HINSHAW

*was duly admitted and qualified as an Attorney and Counselor of said
Court on October 26, 1992, and is in good standing as a member of the bar
of said Court. Furthermore, no pending disciplinary action is on record.*

Clerk of the United States District Court

By:
Deputy Clerk

Issued: June 4, 2007